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Attorneys for Plaintiffs

HINDU AMERICAN FOUNDATION;

SAMIR KALRA; MIHIR MEGHANI;

SANGEETHA SHANKAR; DILIP AMIN; SUNDAR IYER;

RAMANA KOMPELLA; AND DOES ONE TO THREE

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

HINDU AMERICAN FOUNDATION, INC.,
a Florida Not For Profit Corporation; Samir
Kalra Mihir Meghani; Sangeetha Shankar;
Dilip Amin, Sundar Iyer, Ramana Kompella
as individuals; and Doe Plaintiffs One to
Three

Plaintiffs,

vs.

KEVIN KISH, an individual, in his official
capacity as Director of the California Civil
Rights Department; and DOES 1 - 50,
inclusive,

Defendants.

Case No. 2-22-CV-01656-DAD-JDP

**DECLARATION OF DOE ONE ISO
MOTION TO PROCEED UNDER
PSEUDONYM**

Date: November 21, 2023

Time: 1:30 p.m.

Judge: Dale A. Drodz

Date Action Filed: September 20, 2022

1 I, DOE ONE, declare as follows:

2 1. I am a person of South Asian descent. I am a practicing Hindu who works in the
3 technology sector and resides in California.

4 2. Caste discrimination has no place in Hindu teachings, and as a practicing Hindu, I
5 believe only those who practice Hinduism should be allowed to define Hinduism.

6 3. I understand that the California Civil Rights Department has tried to define Hindu
7 beliefs and has defamed my religion by taking the position that the caste system is an inherent
8 part of Hinduism. The CRD has further falsely tied anyone practicing Hinduism to engaging in
9 caste discrimination.

10 4. This is false, dismisses me as a person of South Asian descent practicing
11 Hinduism, and makes me feel insignificant and hopeless that I can possibly speak up for persons
12 of South Asian descent who practice Hinduism without receiving retribution in return.

13 5. I know many Hindus who expressly disagree with the CRD's characterization,
14 and like me, they have told me that it has caused them significant emotional upheaval.

15 6. The CRD's attempts to define Hindu beliefs as including caste falsely identifies
16 me as someone who practices caste discrimination as a religious belief.

17 7. The CRD's actions have caused me significant emotional and spiritual anxiety
18 and insecurity. It has been frustrating for me to have to repeatedly explain to others that
19 Hinduism and caste are not the same and that Hinduism expressly rejects caste as a belief.

20 8. The CRD's actions have caused me embarrassment and has made me feel that
21 others are judging me and undermining my religion because of how I look and what my religious
22 beliefs are.

23 9. I am proud of the diversity and acceptance of my religion, and CRD's actions
24 have set us on a path where my religion is being maligned. Lot of my friends, who are non-

1 Hindus, might think that all this chatter regarding South Asians and Hinduism is simply an
2 annoyance to understand and deal with.

3 10. Rather than reduce negative stigmas against me, persons of South Asian descent,
4 and persons who practice Hinduism, the CRD has instead highlighted this issue and created a
5 fragmented environment of fear and confusion.

6 11. If people know my personal information, I fear that they will try to harm or
7 retaliate against me or my family, either emotionally or in some other way. I also fear that the
8 CRD will come after me and/or interfere with my employer, resulting in permanent negative
9 reputational and economic harm to me or those in my family.

10 I declare under penalty of perjury under the laws of the United States that the above is
11 true and correct. Executed on September 27, 2023, at ____San Diego____,
12 ____CA____.

13
14 /s/ DOE ONE
15 DOE ONE
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